

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

CURCIO MIRZAIAN SIROT LLC
5 Becker Farm Road, Suite 406
Roseland, New Jersey 07068
(973) 226-4534
Victoria Park Association, Inc.

In Re:

Barbara J. Haney

Case No.: 18-25262

Chapter 13

Hearing Date: February 6, 2019

Honorable Christine M. Gravelle

OBJECTION TO CONFIRMATION

I. PRELIMINARY STATEMENT

The Victoria Park Association, Inc (the “Association”) hereby files an objection to Barbara Haney’s (the “Debtor”) Modified Chapter 13 Plan.

II. HISTORY

In the Modified Chapter 13 Petition, the Debtor represented that she is the owner of the Property which is located within the Association, as evidenced by the Debtor’s admission on Schedule “A” of her Bankruptcy Petition.

III. OBJECTION TO PLAN

1. **Modified Plan Filed in Bad Faith.** The Modified Plan was filed in bad faith pursuant to 11 U.S.C. § 1325(a)(3) because the Debtor failed to list the Association's full amount owed under Part 4(a) pursuant to the Proof of Claim filed with the Court on October 2, 2018.

2. **Modified Plan is Not Feasible.** The Modified Plan is not feasible pursuant to 11 U.S.C. § 1325(a)(6).

3. The Debtor has failed to pay the post-petition assessments owed to the Association.

IV. CONCLUSION

The above point headings articulate the deficiencies in with the Debtor's Plan. For the above reasons, the Association does not accept and objects to the Debtor's Plan.

Respectfully Submitted,
CURCIO MIRZAIAN SIROT LLC
Attorneys for Victoria Park Association, Inc.

Date: January 17, 2019

By: /s/ Ellen M. Goodman
Ellen M. Goodman